



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIANA ALEJANDRA VALDEZ,
aka "Adriana Alejandra
Gomez,"
aka "Bernice Valdez,"
aka "Elizabeth Valez," and
ARMIDA GABRIELLA GARCIA,
aka "Armida Gabriella Garcia
Sosa,"
aka "Armida Quelex,"

Defendants.

CR 18-00420-ODW

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 1708: Possession of
Stolen Mail; 18 U.S.C.
§ 1029(a)(3): Possession of
Fifteen or More Access Devices;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft;
18 U.S.C. § 2(a): Aiding and
Abetting]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury and continuing
through on or about October 22, 2017, in Los Angeles County, within
the Central District of California, and elsewhere, defendants ADRIANA
ALEJANDRA VALDEZ, also known as ("aka") "Adriana Alejandra Gomez,"

1 aka "Bernice Valdez," aka "Elizabeth Valez" ("VALDEZ"), and ARMIDA
2 GABRIELLA GARCIA, aka "Armida Gabriella Garcia Sosa," aka "Armida
3 Quelex" ("GARCIA"), together with others known and unknown to the
4 Grand Jury, conspired and agreed with each other to knowingly and
5 intentionally commit offenses against the United States, namely, mail
6 theft and possession of stolen mail, in violation of Title 18, United
7 States Code, Section 1708.

8 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
9 ACCOMPLISHED

10 The objects of the conspiracy were to be accomplished, in
11 substance, as follows:

12 1. Defendants VALDEZ and GARCIA, and others known and unknown
13 to the Grand Jury, would travel in a U-Haul truck to steal mail.

14 2. Co-conspirators known and unknown to the Grand Jury would
15 use a fishing device to steal mail from United States Postal Service
16 mailboxes.

17 3. Defendants VALDEZ and GARCIA would obtain items of value
18 from the stolen mail, including access devices and other items
19 containing victims' personal identifying information.

20 C. OVERT ACTS

21 In furtherance of the conspiracy and to accomplish its objects,
22 on or about the following dates, defendants VALDEZ and GARCIA
23 committed various overt acts within the Central District of
24 California, and elsewhere, including, but not limited to, the
25 following:

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1 Overt Act No. 1: On or before October 22, 2017, defendants
2 VALDEZ and GARCIA, and others known and unknown to the Grand Jury,
3 stole mail and stored the stolen mail in a U-Haul truck.

4 Overt Act No. 2: On October 22, 2017, defendant VALDEZ drove
5 the U-Haul truck with defendant GARCIA and others known and unknown
6 to the Grand Jury to a United States Postal Service mailbox in the
7 parking lot of the United States Post Office located at 18080
8 Crenshaw Boulevard in Torrance, California to steal mail.

9 Overt Act No. 3: On October 22, 2017, in the U-Haul truck,
10 defendants VALDEZ and GARCIA possessed a fishing device for stealing
11 mail out of mailboxes.

12 Overt Act No. 4: On October 22, 2017, in the U-Haul truck,
13 defendants VALDEZ and GARCIA also possessed approximately 69 pieces
14 of stolen mail and mail matter, including approximately 22
15 unauthorized access devices, as well as other items containing
16 victims' personal identifying information.

COUNT TWO

[18 U.S.C. § 1708]

On or about October 22, 2017, in Los Angeles County, within the Central District of California, defendants ADRIANA ALEJANDRA VALDEZ, also known as ("aka") "Adriana Alejandra Gomez," aka "Bernice Valdez," aka "Elizabeth Valez" ("VALDEZ"), and ARMIDA GABRIELLA GARCIA, aka "Armida Gabriella Garcia Sosa," aka "Armida Quelex" ("GARCIA"), unlawfully possessed mail and mail matter that had been stolen and taken from the United States mail, namely, approximately 69 pieces of mail and mail matter addressed to various individuals within Los Angeles County and elsewhere, and at that time and place defendants VALDEZ and GARCIA knew that said mail and mail matter were stolen.

COUNT THREE

[18 U.S.C. §§ 1029(a)(3); 2(a)]

On or about October 22, 2017, in Los Angeles County, within the Central District of California, defendants ADRIANA ALEJANDRA VALDEZ, also known as ("aka") "Adriana Alejandra Gomez," aka "Bernice Valdez," aka "Elizabeth Valez" ("VALDEZ"), and ARMIDA GABRIELLA GARCIA, aka "Armida Gabriella Garcia Sosa," aka "Armida Quelex" ("GARCIA"), each aiding and abetting the other, knowingly and with intent to defraud, possessed at least fifteen unauthorized access devices (as defined in Title 18, United States Code, Sections 1029(e)(1) and (3)), namely, approximately 22 credit, debit, and bank account numbers, all belonging to persons other than defendants VALDEZ and GARCIA, with said possession affecting interstate and foreign commerce.

COUNT FOUR

[18 U.S.C. §§ 1028A(a)(1); 2(a)]

On or about October 22, 2017, in Los Angeles County, within the Central District of California, defendants ADRIANA ALEJANDRA VALDEZ, also known as ("aka") "Adriana Alejandra Gomez," aka "Bernice Valdez," aka "Elizabeth Valez" ("VALDEZ"), and ARMIDA GABRIELLA GARCIA, aka "Armida Gabriella Garcia Sosa," aka "Armida Quelex" ("GARCIA"), each aiding and abetting the other, knowingly possessed without lawful authority, means of identification that defendants VALDEZ and GARCIA knew belonged to another person, namely, the name and address of victim C.F., during and in relation to the offense of Possession of Fifteen or More Unauthorized Access Devices, a felony

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violation of Title 18, United States Code, Section 1029(a)(3), as
charged in Count Three of this Indictment.

A TRUE BILL

/s/

Foreperson

NICOLA T. HANNA
United States Attorney

LAWRENCE S. MIDDLETON
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